

**Finger, Theresa**

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**From:** Anderson, Rapone@DSS [randerso@dss.ca.gov]  
**Sent:** Monday, August 31, 2009 3:29 PM  
**To:** Finger, Theresa  
**Cc:** Ruiz, Karen@DSS  
**Subject:** Trustworthy Electronic Document or Record Preservation - public comments  
**Importance:** High

Hi Theresa,

Below are comments and recommendations from a CDSS/County Welfare Dept. workgroup for the proposed regulations - Trustworthy Electronic Document or Record Preservation:

**Section 23040** The proposed language does not make it totally clear if the requirements apply to both current systems or only to systems to be built in the future. We suggest that the language be changed to the following to make it clear that the requirement applies to future systems: "...are stored and managed in a trusted system, *all future* electronic content management systems shall be designed following appropriate procedures....". If it is the intent to apply these standards to all current systems, at least three years and adequate resources will be needed to retrofit current systems. The window for requesting state funding has closed for 2010/11. Any funding request will need to wait for the 2011/12 state fiscal year. Needed changes can take several years to plan, procure, and implement.

**Section 23070** states that "...at least two (2) separate copies of the official document or record must be created on electronic media...".


This seems to imply that a simple back up copy of the electronic file would meet this requirement, but the wording may also be read to imply that the document needs to also be stored in two different types of electronic forms or systems. This approach would be costly and unnecessary. We suggest re-wording this section as follows: "...a primary and a back up copy of the official document or record must be created on a electronic media...".

**Section 23080** states that "... records shall be maintained in a trusted system as defined in Section 23070, Trusted Storage of Official Electronic Documents or Records, using standard PDF/A format in accordance with ISO 19005. . . ." Given the rapidly developing standards for electronic file and document preservation, we would suggest rewording the section to refer to only the standard, and not the specific format: "... records shall be maintained in a trusted system as defined in Section 23070, Trusted Storage of Official Electronic Documents or Records, using the ISO 9005 standard which is incorporated by reference in this section."

Please let me know if you have any questions or need further clarification.

Thanks,  
Rapone Anderson  
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08/31/2009